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6 Attorney for Joshua Martinez

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 JOSHUA MARTINEZ,
15 Defendant.

Case No. 2:21-cr-00219-APG-DJA

**Stipulation to Continue
Objections to Report and
Recommendation Deadline**
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
18 Frierson, United States Attorney, and Daniel Schiess, Assistant United States
19 Attorney, counsel for the United States of America, and Rene L. Valladares,
20 Federal Public Defender, and Joanne L. Diamond, Assistant Federal Public
21 Defender, counsel for Joshua Martinez, that the due date for the parties' Objections
22 to R&R (ECF No. 67), be extended from June 5, 2023, to June 20, 2023;¹ the due
23 date for responses be extended to July 3, 2023; and the due date for replies be
24 extended to July 10, 2023.

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¹ The parties' briefing schedule is based on a due date of June 19, 2023. June 19 is the Juneteenth court holiday. June 20 is the next business day.

1 This Stipulation is entered into for the following reasons:

2 1. Defense counsel is out of the country from May 27, returning to the
3 office on the current due date of June 5. She will need additional time to prepare
4 the Objections to R&R on her return.

5 2. Mr. Martinez is not in custody and does not oppose the continuance.

6 3. The parties agree to the continuance.

7 4. The additional time requested by the stipulation is made in good faith
8 and not for purposes of delay.

9 This is the first request for a continuance of the objections deadline.

10 DATED: May 25, 2023.

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12 RENE L. VALLADARES
13 Federal Public Defender

JASON M. FRIERSON
United States Attorney

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15 By /s/ Joanne L. Diamond
16 JOANNE L. DIAMOND
Assistant Federal Public Defender

By /s/ Daniel Schiess
DANIEL SCHIESS
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
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5 Plaintiff,

6 v.

7 JOSHUA MARTINEZ,
8 Defendant.

Case No. 2:21-cr-00219-APG-DJA

ORDER

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10 IT IS THEREFORE ORDERED that upon consideration of the parties'
11 Stipulation to Continue Objections to Report and Recommendation Deadline, the
12 deadline to file Objections is extended to June 20, 2023; the deadline to file
13 responses is extended to July 3, 2023; and the deadline to file replies is extended
14 to July 10, 2023.

15 DATED this ____ day of May 2023.

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18 _____
19 UNITED STATES DISTRICT JUDGE
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